

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

MOMODOU TAAL., *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

No. 3:25-cv-335 (ECC/ML)

DECLARATION OF ANTHONY PATRONE

I, Anthony Patrone, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am currently the Deputy Special Agent in Charge (DSAC) for the Buffalo field office of U.S. Immigration and Custom Enforcement's (ICE) Homeland Security Investigations (HSI). I have held this position since May 2023. Prior to this position, I served in various leadership roles at HSI, including as an HSI Buffalo Assistant Special in Charge (ASAC), a Unit Chief for HSI International Operations, and as an investigative Group Supervisor. I have been employed as a Special Agent with HSI since August 2004. In these various roles, and nearly 21 years of experience with the agency, I have overseen investigations of suspected violations of federal law as they pertain to the United States immigration and customs laws, including violations related to the Immigration and Nationality Act (INA).

2. I am aware of the above captioned lawsuit. I provide this declaration based on my personal knowledge, reasonable inquiry, and information obtained from various records, systems,

databases, other Department of Homeland Security (DHS) officials, and information portals maintained and relied upon by DHS in the regular course of business.

3. Mr. Taal is a native of The Gambia and citizen of the United Kingdom. He was most recently admitted into the United States on December 22, 2024, at JFK International Airport, New York, New York, as a nonimmigrant using a nonimmigrant student visa (F-1) to attend Cornell University, Ithaca, New York.

4. On March 14, 2025, ICE was notified the U.S. Department of State revoked Mr. Taal's F-1 visa. Due to the revocation, Mr. Taal is removable from the United States pursuant to Section 237(a)(1)(B) of the Immigration and Nationality Act for being an alien who is present in the United States in violation of law or whose authorization to be present in the United States has been revoked under Section 221(i). Mr. Taal's presence in the United States without status and in violation of immigration law is the basis of ICE's enforcement action.

5. Between March 14, 2025, and the present, ICE has attempted to locate Mr. Taal in the Ithaca, New York area to perform a civil arrest and process him for removal proceedings before an immigration judge, including serving Mr. Taal with a copy of a Form I-862, Notice to Appear, notifying him of the charge of removability to commence removal proceedings. As of the date of this declaration, ICE has been unable to locate Mr. Taal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of March 2025.

Anthony Patrone
Deputy Special Agent in Charge
Homeland Security Investigations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security